UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,	Civil Action No. 1:19-cv-12551-FDS
Plaintiff,	
v.	Hon. F. Dennis Saylor IV
GOOGLE LLC,	
Defendant.	

DECLARATION OF KEVIN GANNON IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANT'S
MOTION TO AMEND

I, Kevin Gannon, hereby declare as follows:

1.   I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff,

Singular Computing LLC ("Singular"), in this action. I submit this declaration is support of

Singular's opposition to the motion of defendant, Google LLC ("Google"), to amend.

2.   Singular produced a copy of the Belanović thesis to counsel for Google in this

case on or around October 7, 2020.

3.   Singular produced a copy of the Coleman *et al.* article to counsel for Google in

this case on or around April 15, 2021.

4.   Attached hereto as Exhibit A is a true and correct copy of an email from Deeva V.

Shah to counsel for Singular dated August 10, 2021.

5.   Attached hereto as Exhibit B are true and correct copies of the front pages of:

U.S. Patent No. 8,407,273; U.S. Patent No. 9,218,156; and U.S. Patent No. 10,416,961.

6.   Attached hereto as Exhibit C is a true and correct copy of excerpts from the

transcript of Volume 3 of the deposition of Dr. Joseph Bates that was taken by Google in this

case on July 23, 2021.

7.   Attached hereto as Exhibit D is a true and correct copy of excerpts from the transcript of the deposition of Robert Plotkin that was taken by Google in this case on July 23, 2021.

8.   Attached hereto as Exhibit E is a true and correct copy of a page downloaded from https://scholar.google.com on or around July 5, 2022 showing a link to a thesis dated May 2002 by Google Scholar Pavle Belanović titled "Library of Parameterized Hardware Modules for Floating-Point Arithmetic with An Example Application."

9.   Attached hereto as Exhibit F is a true and correct copy of a page downloaded from https://scholar.google.com on or around July 5, 2022 showing a link to a publication dated 2008 by Google Scholar J.N. Coleman *et al.* titled "The European logarithmic microprocessor."

Executed at Boston, Massachusetts on July 8, 2022.

/s/ Kevin Gannon